

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 511 & 821

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**LANDLORD’S SUPPLEMENTAL LIMITED  
OBJECTION TO CURE NOTICE AND RESERVATION OF RIGHTS**

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BVB-NC, LLC (the “Landlord”) files its supplemental limited objection, reservation of rights, and joinder (the “Supplemental Limited Objection”) with respect to the *Debtors’ Notice of Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and Cure Amount* (D.I. 511) (the “Cure Notice”), and in support thereof respectfully states as follows:

1. On November 3, 2024, the Landlord filed its initial limited objection, reservation of rights, and joinder to the Cure Notice [D.I. 821] (the “Limited Objection”)².
2. In its Limited Objection, the Landlord listed the Cure Amount as \$29,327.41.
3. Landlord now supplements its objection to change the Cure Amount as of the Petition Date to \$31,037.59 (the “Revised Cure Amount”). The basis for the Revised Cure Amount is set forth in the supporting affidavit attached hereto as **Exhibit A**.

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081

<sup>2</sup> Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Objection.

4. The remaining objection is incorporated/not modified and Landlord reserves all rights.

Dated: December 18, 2024  
Wilmington, Delaware

**ESBROOK P.C.**

/s/ Scott J. Leonhardt

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